

KM&M
K A U F F M C G U I R E M A R G O L I S L L P

950 THIRD AVENUE · FOURTEENTH FLOOR
NEW YORK, NY 10022

TELEPHONE (212) 644-1010

FAX (212) 644-1936

**APPLICATION GRANTED
SO ORDERED** 

February 23, 20

**VERNON S. BRODERICK
U.S.D.J.** 2/24/2017

VIA ECF

Honorable Vernon S. Broderick
United States District Court for the
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 518
New York, New York 10007

Re: Reggie Anders v. Verizon Commn'cs Inc., et al.
SDNY Docket No. 16 Civ. 5654 (VSB)
KM&M File No. 10503.00183

Dear Judge Broderick:

We represent Defendants Verizon Communications Inc. and Cellco Partnership d/b/a Verizon Wireless in the above-referenced matter. We write jointly with Plaintiffs Reggie Anders and Underdog Trucking LLC ("Plaintiffs") and Defendants Rev. Al Sharpton and National Action Network. Per the Court's Order of February 16, 2017, the parties have met and conferred regarding a proposed briefing schedule for Plaintiffs' anticipated motion to file a Third Amended Complaint and Defendants' anticipated motions to dismiss the Second Amended Complaint. In the interest of judicial efficiency, Defendants have requested that Plaintiffs provide them with a copy of the proposed Third Amended Complaint so that Defendants can determine whether they will not object to Plaintiffs' motion to amend the complaint, thus avoiding the need for briefing regarding the motion to amend. Plaintiffs have agreed to this suggestion, but will be unable to prepare a draft of the Third Amended Complaint prior to February 23, 2017, the date that the parties' proposed briefing schedule is due. The parties therefore jointly request permission to submit their proposed briefing schedule to the Court on or before March 2, 2017.



VIA ECF

Hon. Vernon Broderick
February 23, 2017
Page 2

We thank the Court for its consideration of this matter.

Very truly yours,

/s/

Raymond G. McGuire

cc: Japheth N. Matemu, Esq.
Wylie M. Stecklow, Esq.
David A. Thompson, Esq.